

- IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

complexity of the case, the significant discovery material (approximately 53 gigabits of data), and the constraints caused by the COVID-19 pandemic, Defendant's counsel require additional time to prepare for trial.

4. Assistant United States Attorney Chris Looney has advised that he assents to the requested relief.

For the foregoing reasons, Defendant respectfully requests that the Court continue the trial scheduled in this matter to April 1, 2021, or such other date in or after April 2021 that is convenient for the Court.

Respectfully submitted,

TANMAYA KABRA

By his attorneys,

/s/ Michael J. Connolly

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Dated: December 15, 2020

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document filed through the ECF system will be sent electronically by the ECF system to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 15, 2020.

/s/ Michael J. Connolly  
Michael J. Connolly